1 2 3 4 5 6 7 8 9 10 11 12 13 14	Jerry L. Marks (SBN 135395) Email: jmarks@milbank.com Aaron Renenger (SBN 222675) Email: arenenger@milbank.com MILBANK, TWEED, HADLEY & McCLOY LLP 601 S. Figueroa Street, 30th Floor Los Angeles, California 90017 Telephone: (213) 892-4000 Facsimile: (213) 629-5063 David R. Gelfand (admitted pro hac vice) Email: dgelfand@milbank.com Rachel Penski Fissell (admitted pro hac vice) Email: rfissell@milbank.com MILBANK, TWEED, HADLEY & McCLOY LLP 1 Chase Manhattan Plaza New York, NY 10005 Telephone: (212) 530-5000 Facsimile: (212) 822-5661 Attorneys for Defendants STA Development, LLC, Solar Trust of America, LLC, Solar Millennium, Inc., CA I-10 Solar, LLC, Palo Verde Solar I, LLC, Palo Verde Solar II, LLC, Blythe Solar Power Project Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,	
15	Blythe Solar Power Project Unit 3, LLC and Blythe Solar Power Project Unit 4, LLC	
16	UNITED STATES DISTRICT O	COURT
17	NORTHERN DISTRICT OF CAL	IFORNIA
18	SAN FRANCISCO DIVISI	ON
19	MMR GROUP, INC.,	Case No. 3:11-cv-01521-EMC
20	MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC, Plaintiffs,	EIGHTH STIPULATION TO EXTEND DEFENDANTS'
21	vs.	TIME TO RESPOND TO AMENDED COMPLAINT
22		AND [PROPOSED] ORDER
23 24	STA DEVELOPMENT, LLC (F/K/A SOLAR MILLENNIUM, LLC), SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM AG,	The Honorable Judge Edward M. Chen
25	SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,	
26	PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,	
27	LLC, BLYTHE SOLAR POWER PROJECT UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC	
28	AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC Defendants.	

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Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC (collectively, the "STAD Defendants") respectfully request that the Court extend the time for the STAD Defendants to respond to the Amended Complaint, filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011, by two weeks from January 24, 2012 to February 7, 2012.

On November 4th and 14th, the parties requested, and this Court later granted, a one-week extension of time for the STAD Defendants to respond to the Amended Complaint because the parties were in advanced stages of settlement discussions. On November 22nd, December 1st, December 27th, and January 10th, the parties requested, and this Court later granted, extensions of two weeks due to continued progress in settlement negotiations. The parties continue to be hopeful that they will execute a settlement agreement forthwith. Due to the continued progress in reaching a settlement, the parties request a two-week extension of the time for the STAD Defendants to respond to the Amended Complaint. The parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that the Court extend the STAD Defendants' time to respond to the Amended Complaint by two weeks from January 24, 2012 to February 7, 2012.

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1	Dated: January 20, 2012 MILBANK, 7	TWEED, HADLEY & McCLOY LLP
2	By: <u>/s/ Rachel</u>	Penski Fissell
3	7	Tarks (SBN 135395)
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5	Telephone	e: (213) 892-4000 (213) 629-5063
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10	10 Facsimile:	(212) 822-5661
11		Defendants STA Development, LLC,
	Solar Trust of	America, LLC, Solar Millennium, Inc.,
12		, LLC, Palo Verde Solar I, LLC, plar II, LLC, Blythe Solar Power Project
13	13 Unit 1, LLC, H	Blythe Solar Power Project Unit 2, LLC,
14	14 Blythe Solar F Power Project	Power Project Unit 3, LLC and Blythe Solar t Unit 4, LLC
15	Dated: January 20, 2012 WATT, TIEI	DER, HOFFAR & FITZGERALD, LLP
	• '	,
16	16	
16 17	By: /s/ Nichol Bennett J.	as A. Merrell Lee (CA Bar No. 230482)
17	By: <u>/s/ Nichol</u> Bennett J. Nicholas A	as A. Merrell Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795)
17 18	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush	as A. Merrell Lee (CA Bar No. 230482)
17	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San France	as A. Merrell Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104
17 18	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San France Telephone	as A. Merrell Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000
17 18 19	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San Franc Telephone Facsimile:	as A. Merrell Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000 415-623-7001
17 18 19 20	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San Franc Telephone Facsimile: Attorneys for A	as A. Merrell Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000
17 18 19 20 21	By: /s/ Nichol Bennett J. Nicholas A Regina A. San Franc Telephone Facsimile: Attorneys for Solutions, LLC Solutions, LLC	Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000 415-623-7001 Plaintiffs MMR Group, Inc., MMR Power C and Southwestern Power Group II, LLC
17 18 19 20 21 22	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San Franc Telephone Facsimile: Attorneys for Solutions, LLC PURSUANT TO STIPULATION, IT IS SO ORDER	Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000 415-623-7001 Plaintiffs MMR Group, Inc., MMR Power C and Southwestern Power Group II, LLC
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17 18 19 20 21 22 23 24	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San France Telephone Facsimile: Attorneys for Solutions, LLC PURSUANT TO STIPULATION, IT IS SO ORDER Dated: 1/23/12	Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000 415-623-7001 Plaintiffs MMR Group, Inc., MMR Power C and Southwestern Power Group II, LLC
17 18 19 20 21 22 23 24 25	By: /s/ Nichola Bennett J. Nicholas A Regina A. 333 Bush San France Telephone Facsimile: Attorneys for Solutions, LLC Dated:	Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000 415-623-7001 Plaintiffs MMR Group, Inc., MMR Power C and Southwestern Power Group II, LLC RED. TES DISTRICT UNIXED STATES DISTRICT ORDERED
17 18 19 20 21 22 23 24 25 26	By: /s/ Nichol Bennett J. Nicholas A Regina A. 333 Bush San Franc Telephone Facsimile: Attorneys for Solutions, LLC PURSUANT TO STIPULATION, IT IS SO ORDER Dated:	Lee (CA Bar No. 230482) A. Merrell (CA Bar No. 240795) Verducci (CA Bar No. 264996) Street, Suite 1500 isco, CA 94104 e: 415-623-7000 415-623-7001 Plaintiffs MMR Group, Inc., MMR Power C and Southwestern Power Group II, LLC

EIGHTH STIPULATION TO EXTEND DEFENDANTS VIME TO RESPOND TO AMENDED COMPLAINT AND [PROPOSED] ORDER